

EXHIBIT A:
STIPULATED FACTS

The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, the government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

The defendant, **CARLTON WILLIAMS** ("**WILLIAMS**"), was a resident of Silver Spring, Maryland.

On October 7, 2006, **WILLIAMS** purchased a 30 day membership to the website "Home Collection" for \$79.95. This membership provided access to a website that offered images of children engaged in sexually explicit conduct.

On November 5, 2006, **WILLIAMS** purchased an additional 30 day membership to the website "Home Collection" for \$79.95. This membership provided further access to the same website that offered images of children engaged in sexually explicit conduct.

The Home Collection website, along with over a dozen other websites, was identified by law enforcement as selling access to images and videos depicting children engaged in sexually explicit conduct. Subscribers to these websites were identified through their Paypal accounts. **WILLIAMS** utilized his Paypal account and personal identifiers to facilitate both purchases.

On February 8, 2011, law enforcement conducted an interview with **WILLIAMS**, who confessed to downloading and possessing child pornography since 2001. **WILLIAMS** downloaded the majority of his child pornography from commercial websites and would masturbate to the images. **WILLIAMS** provided law enforcement with consent to search his computers and digital media.

Forensic analysis of **WILLIAMS**'s computer and DVDs revealed over 6,000 images and 100 videos depicting children engaged in sexually explicit conduct, including images of prepubescent minors who had not attained the age of 12 years. The following videos were on the computer and digital media items seized from **WILLIAMS**:

- * sweetmini.mpg, which was downloaded on 02/03/2011 and depicts an adult male and an Asian prepubescent female. The video begins with the words "So horny with 6 years" written on the screen. The prepubescent female is laying on the bed nude with her legs spread and the camera aimed at her genitalia while the adult male is fondling her genitalia. The adult male then places his penis in the child's mouth and masturbates, eventually ejaculating on the child's face.

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- * blowjob with tongue.avi, which was downloaded on 02/06/2011 and depicts an adult male and a nude Asian prepubescent female. The child is lying on a couch with her head near the male's genitalia. The child is licking the male's genitalia and performing oral sex on him.
- * fuck from behind.avi, which was downloaded on 02/06/2011 and depicts an adult male and a prepubescent Asian female. The adult male is penetrating the child from behind as she is kneeling in front of him.

The images and videos depict real children engaged in sexually explicit conduct. The images downloaded onto the defendant's computer were transported through the Internet and therefore traveled in interstate commerce.

I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

11/21/11
Date

Carlton Williams
Carlton Williams

I am Carlton Williams' attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is a voluntary one.

11/21/11
Date

Charles L. Waechter, Esq.
Charles L. Waechter, Esq.